

January 13, 2015

Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly
c/o Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Comments in ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 Via Electronic Filing

Dear Chairman Wheeler, Commissioner Clyburn, Commissioner Rosenworcel, Commissioner Pai, Commissioner O'Rielly and Ms. Dortch,

On behalf of Goodspeed Musicals, located in East Haddam, Connecticut, that provides approximately 360 performances a year to 100,000 audience members and education programs to 600 students. The mission of the Goodspeed Opera House Foundation (DBA Goodspeed Musicals) is to preserve and produce musical theatre of the highest quality. By producing from the repertoire and developing new works, Goodspeed acts as a major resource for the musical, an art form indigenous to this country. I write with concern about protection for our wireless microphones and backstage communications devices.

I understand the Commission has ruled that performing arts entities that regularly use 50 or more wireless devices will be eligible to apply for a Part 74 license. I've also learned that the FCC is seeking Comment on a proposed rule that would prevent performing arts entities using fewer than 50 wireless devices from participating in the database. This would leave my organization without any interference protection mechanism from the many TV Band Devices that may soon flood the market. Frequency coordination with other known wireless microphone users has become common practice, but there is no way to coordinate with TVBD's if you don't know about them.

Thousands of performances are held by professional performing arts organizations each year and the use of wireless microphones is both essential to producing high-quality performances and also mitigates against significant public safety concerns. Professional wireless capability, with successful interference protection, is essential to our sector.

The Goodspeed uses between 30 and 40 wireless microphones per performance, and 3-5 wireless communication headsets-all area analog, and we own all of our equipment. We expect to use this

equipment for the next 10-15 years. Performances run April through December 8 shows per week, generally Wednesday through Sunday. We make use of VHF and both low and high UHF. Some but not all of our equipment have varying degrees of ability to tune to other frequencies. Our wireless communication headsets operate outside of the TV bands in the 2.4 Ghz range.

I appreciate that the Commission has sought Public Comment on these very important issues. Professional performing arts organizations should all have some sort of interference protection. While some entities will be protected by access to the geo-location database, many professional performing arts organizations will not under this plan. Further, I would request that the Commission consider the burden already borne by the performing arts community in vacating the 700 MHz band. I am concerned about the cost of once again replacing my theatre's sound equipment. It cost us \$25,000 and took two years to fully move out of the 700 Mhz band.

Performing arts organizations provide demonstrable service to the public in improving quality of life; preserving our cultural heritage; and in providing education, enlightenment, entertainment. They also contribute to local economies in every community across this country. I respectfully request that the Commission maintain access to interference protection and establish a mechanism to reimburse performing arts organizations for the cost of new equipment.

Sincerely,

R. Glen Grusmark

Production Manager, Goodspeed Musicals